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To: <docket@energy.state.ca.us>
Date: 11/12/03 3:23PM
Subject: CEC Docket No. 03-RPS-1078

California Energy Commission

RE: Docket No. 03-RPS-1078

Docket Unit MS-4

docket@energy.state.ca.us,

To Whom It May Concern,

Attached, please find a document entitled "National Consumer-Owned Power Wholesale Renewable Energy Credit Certification Guidelines." This document was prepared through a collaborative process involving representatives from the National Rural Electric Cooperative Association, Western Area Power Administration, Bonneville Power Administration, and the American Public Power Association; as well as several western-based consumer-owned utilities, including Tri-State Generation and Transmission Cooperative, Basin Electric Cooperative, Plumas Sierra Electric Power Cooperative Los Angeles Department of Water and Power, Northern California Public Power Agency, Arizona Power Authority, Colorado River Commission, Nebraska Public Power District, among others such as EnerVision and AWS Scientific.

These guidelines represent the fundamental criteria needed to identify and track renewable energy credits. It is our hope that the Western Regional Energy Generation Information System (WREGIS) final plan avoids extraneous requirements that do not directly relate to the generation of renewable energy. The guidelines we've created through this collaborative process also reflect the National Association of Attorneys General Guidelines on Environmental Marketing. It is extremely important to the family of consumer-owned utilities to ensure reasonable program and administrative cost-containment to encourage the broadest possible participation among consumer-owned utilities.

In the near future, Western Area Power Administration will be releasing an RFI on behalf of consumer-owned utilities to review qualifications and proposed implementation and teaming strategies of contractors capable of performing Renewable Energy Credit Tracking, Certification and Marketing. At some point, I hope there is an opportunity for our consumer-owned utility effort to collaborate with WREGIS. Through our combined efforts we may be able to develop a far better program than each of us might if we follow independent paths.

Sincerely,

Eric Dominguez

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